

LAW OFFICES OF JILL R. SHELLOW

Telephone: 212.792.4911 / Fax: 212.792.4946 / jrs@shellowlaw.com
All correspondence to: 80 Broad Street, Suite 1900, New York, NY 10004

All Correspondence During COVID Pandemic:
Post Office Box 612 / Hastings on Hudson, NY 10706

August 30, 2021

ECF FILING REDACTED

Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312
LimanNYSDChambers@nysd.uscourts.gov

Re: USA v. Isabella Pollok, 20-Cr-110 (LJL)

Dear Judge Liman:

David Bertan and I represent Isabella Pollok. Last week we learned that Ms. Pollok has documents of other individuals that are arguably protected by HIPAA. These records were found in a location where the Government executed search warrants, but they were not seized by the Government. Our paralegal has sorted, scanned, and counted the pages. We have not read the documents. More specifically, Ms. Pollok has approximately 325 pages of Jane Doe #2's [REDACTED] records. Ms. Pollok also has approximately 52 pages of [REDACTED]'s records, four pages of [REDACTED]'s documents and approximately 430 pages of records of [REDACTED]. Ms. Pollok may have other, similar documents that we have not yet located, including in other locations that the Government has searched.

In light of the pending litigation on whether documents of this nature are privileged, we respectfully seek direction from Your Honor about how we should handle these records. Although neither [REDACTED] nor [REDACTED] have sought to intervene in the pending litigation, both are represented by counsel, and we have provided the unredacted version of this letter to their attorneys.

Respectfully submitted,



Jill R. Shellow
David K. Bertan

JRS/DKB

cc: All Counsel (by email)